

IN THE DISTRICT COURT
OF THE UNITED STATES FOR THE
MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION

DONNA DORSEY DAVIS,
as an individual and derivatively upon
behalf of I-65 PROPERTIES, INC.,

PLAINTIFF,

VS.

RICHARD M. DORSEY,
as an individual and CD&O, LLC
as a necessary party.

DEFENDANTS.

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Civil Action No.
2:06cv766-MHT

DEFENDANT'S PROPOSED VOIR DIRE

COMES NOW the Defendant, by and through undersigned counsel, and request that this
Honorable Court pose the following questions to the jury panel:

1. Does any member of the jury venire know Donna Dorsey Davis or Richard
“Dick” Dorsey?
2. Has any member of the jury venire had any business dealings with Donna Dorsey
Davis or Richard “Dick” Dorsey?
3. Has any member of the jury venire been sued by a relative or has a relative ever
sued you?
4. Has any member of the jury venire previously been involved in a shareholder
derivative suit?
5. Has any member of the jury venire ever filed a claim or had a claim or suit filed
against you for Breach of Fiduciary Duty?
6. Is any member of the jury venire a shareholder in a small, close or family
corporation?

7. Has any member of the jury venire had the responsibility of managing or tending to the business affairs of a small corporation?

RESPECTFULLY SUBMITTED,

By: //s// Clifford W. Cleveland
Attorney Code: CLE007

OF COUNSEL:

***The Law Office of
Cleveland & Colley, P. C.
Post Office Box 680689
Prattville, Alabama 36068
(334) 365-1500***

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of July, 2007, I electronically filed the foregoing with the Clerk of the Court using electronic filing system which will send notification of such filing to the following:

Lindsay B. Erwin, Esquire
3516 Vann Road, Suite 114
Birmingham, Alabama 35235

James E. Roberts, Esquire
4908 Cahaba River Road
Birmingham, Alabama 35243

/s/ Clifford W. Cleveland
OF COUNSEL